

1014 Tyson Avenue
Philadelphia, PA 19111
January 24, 2001

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U.S. Food and Drug Administration
Dockets Management Branch
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket Number 98P-0151/CP1

Dear Sir or Madam:

This letter is written to urge the Food and Drug Administration to grant Petition No. 98P-0151/CP1 referenced above in order to prohibit the slaughter of downed animals.

There is a growing consensus -- even among livestock industry and government officials -- that the marketing and slaughter of downed animals is unacceptable. Animals who are too sick or injured even to stand should not be allowed to enter any food chain, but be euthanized instead.

An additional reason that downed animals should not be allowed in any food chain is the evidence that there is increased risk for bacterial contamination in some downed animals afflicted with a form of BSE (Bovine Spongiform Encephalopathy or "Mad Cow Disease"), a disease which has been linked to fatal human illness (CJD or Creutzfeldt-Jakob Disease).

It is impossible to move downed animals humanely, and they are typically pushed with tractors or dragged with chains -- inhumane processes which cause additional injuries ranging from bruises and abrasions to broken bones and torn ligaments.

Downed animals comprise a very small percentage of animals slaughtered, and prohibiting their marketing will cause no undue economic hardship. Industry experts have estimated that 90% of downed animals can be prevented with better care and handling. Removing the market for downed animals will provide an incentive to industry to prevent downed animals in the first place.

Thank you for your efforts on this behalf.

Sincerely yours,



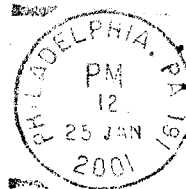
Deborah Austin

98P-0151

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WORLD WILDLIFE FUND



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